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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

THE UNITED STATES OF AMERICA,  
Plaintiff,

vs.

REYES DANIEL RUIZ,  
Defendant.

Case No.: CR 19-00159 EJD

PETITION TO MODIFY THE CONDITIONS  
OF RELEASE TO PERMIT  
INTERNATIONAL TRAVEL

BEFORE THE HONORABLE JUDGE  
VIRGINIA DEMARCHI

DATE: July 11, 2019  
TIME: 10:00 AM  
DEPT.: 2, 5TH FLOOR

**PETITION TO MODIFY CONDITIONS OF RELEASE TO PERMIT**  
**INTERNATIONAL TRAVEL**

Defendant Reyes Daniel Ruiz, by and through his attorney, Mary Ann F. Bird,  
respectfully requests this Court to issue an order granting permission for travel to Mexico to  
attend a prepaid family vacation.

BIRD & VAN DYKE  
PETITION TO MODIFY THE CONDITIONS OF RELEASE TO PERMIT INTERNATIONAL  
TRAVELBEFORE THE HONORABLE JUDGE VIRGINIA DEMARCHIDATE: JULY 11, 2019TIME: 10:00  
AMDEPT.: 2, 5TH FLOOR - 1

1. On April 4, 2019, Defendant was charged by indictment for a violation of 18 U.S.C. section 1030, to wit: Computer Intrusion; and 18 U.S.C. section 2511; to wit: Interception of Wire or Electronic Communications.
2. On April 10, 2019, Defendant was arraigned and released on personal bond. He is being monitored by US Pretrial, Sacramento Office.
3. Defendant and his family are scheduled to depart Friday, July 19, 2019 from San Jose International Airport and arriving in Guadalajara, Mexico the same day. Defendant and his family will return home on Monday, August 5, 2019. (See attachment: Itinerary)
4. The purpose of this trip is to participate in the yearly family reunion for both Mr. Ruiz's side of the family as well as Mrs. Ruiz's side of the family. The majority of both respective families live in Guadalajara, Mexico.
5. If allowed to travel internationally, Defendant will maintain his contacts with U.S. Pretrial in any manner deemed appropriate by this Court. Defendant is also willing to check in with the State Department officials at the US Embassy in Guadalajara, Mexico as a method of maintaining contact with US Pretrial.
6. US Pretrial has denied the Defendant's request and instructed Defendant to seek court approval.
7. AUSA Daniel Kaleba was contacted on June 27, 2019. He opposes this request as well.

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Wherefore, for the foregoing reasons, and for any other reason that may appear to the Court, it is respectfully requested that the Defendant's petition for modification be granted and an order issued permitting Mr. Ruiz to travel with his family to Mexico.

Respectfully submitted,

Date: June 27, 2019

\_\_\_\_\_/s/ Mary Ann F. Bird\_\_\_\_\_  
MARY ANN F. BIRD  
Attorney at Law on behalf of Defendant

**CERTIFICATE OF SERVICE**

By agreement with AUSA Daniel Kaleba, I hereby certify that on June 27, 2019 the foregoing petition was served electronically upon AUSA Daniel Kaleba to email address: [Daniel.Kaleba@usdoj.gov](mailto:Daniel.Kaleba@usdoj.gov).

\_\_\_\_\_/s/ Mary Ann F. Bird\_\_\_\_\_  
MARY ANN F. BIRD  
Attorney at Law on behalf of Defendant

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BIRD & VAN DYKE  
PETITION TO MODIFY THE CONDITIONS OF RELEASE TO PERMIT INTERNATIONAL  
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**[PROPOSED] FINDINGS AND ORDERS**

After a hearing upon the merits and with good cause showing,

The Court hereby grants the request for modification and hereby modifies the Defendant's conditions, entered in the above-captioned case on April 10, 2019, granting him permission to travel to Guadalajara, Mexico to attend a family vacation.

IT IS SO ORDERED.

DATE:

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HONORABLE VIRGINIA DEMARCHI  
UNITED STATES MAGISTRATE JUDGE